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June 15, 2020

VIA E.C.F. AND ELECTRONIC MAIL

Hon. Paul A. Engelmayer
United States District Court Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York NY 10007

Re: United States v. Christopher Simon, 18 Cr. 390 (PAE) – 2-week extension of time to file submission

Dear Judge Engelmayer:

I write to request a 2-week extension of time to file a submission in this matter. This is the first request for an extension of time. The Government has consented to the request. Defense counsel's submission is due Tuesday, June 16, 2020. I have conferred with the Government, and it is my understanding that the Medical Department at Fort Dix, has submitted a request for a Reduction in Sentence pursuant to 18 USC §3582 to Warden Hollingsworth at the facility. The Government has further informed me that the request is likely to be granted if Mr. Simon is able to provide information regarding an adequate release plan.

To facilitate Mr. Simon's release plan, I have contacted Mr. Simon's sister to ascertain whether he would be able to live with her upon release. Also, Mr. Simon has two daughters with whom he may be able to live, and I have contacted Fort Dix to schedule a legal call, so that we can further discuss the matter. Accordingly, I request a 2-week extension of time to file a submission in this matter, so that I may focus on helping Mr. Simon organize an appropriate release plan.

Respectfully Submitted,



Karloff C. Commissiong, Esq.

Granted. Defense counsel's submission is due June 30, 2020.

SO ORDERED.

cc: A.U.S.A. Robert Sobelman (Via Electronic Mail)



PAUL A. ENGELMAYER
United States District Judge

June 16, 2020